



TOYOTA TSUSHO NEXTY ELECTRONICS

September 18th, 2021

Marlene H. Dortch
Secretary, Federal Communications Commission
Washington, DC 20554

Re: Amendment of Section 15.255 of the Commission's Rules
ET Docket No. 21-264

Dear Ms. Dortch,

On behalf of NEXTY Electronics Corporation ("Nexty"), I write to express support for adoption of rules that are fully in-line with the ETSI standards for use by pulse radar systems in the 60 GHz band.

Nexty is a group company of Toyota Tsusho Corporation and an electronic components distributor for mainly automotive industry. Nexty distribute Acconeer pulse radar sensors to automotive customer for kick sensor application. Nexty plans to market pulse radar in the United States. One of our automotive customer is interested in using Acconeer pulse radar sensor for their automotive access control and interior detection sensing application from 2022. Nexty has chosen the Acconeer pulse radar technology for these products because of accuracy and battery efficiency and we see that new innovative products can be developed with this technology.

For these reasons, Nexty supports Acconeer's goals in having the Federal Communications Commission adopt new rules for Section 15.255 that would allow the successful operations of devices that employ pulse radar sensors. Nexty understands that certain of the FCC's proposals, such as adoption of a duty cycle requirement, establishing peak transmitter conducted power limits, or implementing a channelization requirement, would greatly limit the use of pulse radar systems in the United States, denying consumers the opportunity to enable hands-off door opening of the car.

The FCC should maintain simplicity and technical neutrality in its rules by following the ETSI standard for short-range radar which operate in the 60 GHz band. This would also make it easier and less costly for product designers to bring new products to the United States.

Sincerely,

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